



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 23, 2018

Arianna Shorey
Regulatory Consultant, Agent
Douglas Products and Packaging Company
c/o Pyxis Regulatory Consulting Inc.
4110 136th St. Ct. NW
Gig Harbor, WA 98332

Subject: Label Amendment – Revising Instructions for Water Soluble Packages
Product Name: Roo-Pru Super Tri Pak
EPA Registration Number: 1015-72
Application Date: April 20, 2017
Decision Number: 538602

Dear Ms. Shorey:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Connie Hernandez by phone at (703) 305-5190, or via email at Hernandez.Connie@epa.gov.

Sincerely,



Reuben Baris, Product Manager 25
Herbicide Branch
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

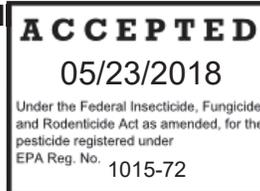
RESTRICTED USE PESTICIDE
Due to Acute Inhalation Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

ROO-PRU[®] SUPER TRI PAK

Only for use in a combination of metam-sodium, dichlobenil, and foaming agent as directed

This product contains:



1. ROO-PRU MS-32.7S

ACTIVE INGREDIENT:	% By Weight
Metam-sodium (sodium methylthiocarbamate)	32.7%
OTHER INGREDIENTS:	<u>67.3%</u>
TOTAL:	100.0%

Contains 3.18 lbs. active ingredient per gallon.

2. ROO-PRU DCB-85W

ACTIVE INGREDIENT:	% By Weight
Dichlobenil (2,6-dichlorobenzonitrile)	85.0%
OTHER INGREDIENTS:	<u>15.0%</u>
TOTAL:	100.0%

3. ROO-PRU WFA (Wetting-Foaming Agent)

KEEP OUT OF REACH OF CHILDREN
DANGER - PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
 (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
IF ON SKIN OR CLOTHING:	Take of contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF INHALED:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
IF IN EYES:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue

	rinsing eye. Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
For emergency information on Roo Pru® Super Tri Pak, call the National Pesticides Information Center 1-800-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.	
NOTE TO PHYSICIAN	
Probable mucosal damage may contraindicate the use of gastric lavage.	

EPA Reg. No. 1015-72

EPA Est. No.

Manufactured for:

Douglas Products and Packaging Company
1550 East Old 210 Highway
Liberty, MO 64068

Net Contents:

- | | | |
|----------------------------------|-------------------------|---------------------------|
| 1. Metam-Sodium: | ROO-PRU MS-32.7S | 5 (2x2 ½) gal. |
| 2. Dichlobenil: | ROO-PRU DCB-85W | 20 (2x10) oz. |
| 3. Wetting-Foaming Agent: | ROO-PRU WFA | <u>2 (2x1) pt.</u> |
| | Total | 5 CMG* |

*Chemical mix gallon

Left Panel – Outer Box Label

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
DANGER**

Corrosive. Causes skin burns. May be fatal if absorbed through skin. Do not get in eyes, on skin or on clothing. Harmful if swallowed or inhaled. Causes moderate eye irritation. Avoid breathing vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All fumigant handlers who apply or may be exposed to either liquid spray or vapors must wear:

- coveralls over long-sleeve shirt and long pants,
- chemical-resistant gloves made of any waterproof material,
- chemical-resistant footwear plus socks,
- a NIOSH-approved full-face, or helmet/hood style respirator with either
 - an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or
 - a respirator with a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).

All mixers and loaders must wear:

- long-sleeved shirt, long pants,
- chemical resistant gloves made of any waterproof material,
- chemical resistant footwear plus socks,
- chemical-resistant apron if transferring or loading the fumigant or cleaning up spills or equipment, and
- be provided, have immediately available, and must wear in an emergency a respirator of the type required in this section.

All support personnel who remain outside the treatment zone and who are not exposed to either liquid spray or vapors must wear:

- long-sleeved shirt, long pants, shoes, and socks, and
- be provided, have immediately available, and must wear in an emergency, such as when they may be exposed to liquid spray or vapors, the handler PPE listed in this section.

See the engineering control section for additional requirements.

USER SAFETY REQUIREMENTS

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

- Users should wash hands before, eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

ENGINEERING CONTROLS AND APPLICATION RESTRICTIONS

Mixers and loaders must use a system that is capable of removing the pesticide from the shipping container and transferring it into mixing tanks and/or application equipment. At any disconnect point, the system must be equipped with a dry disconnect or dry couple shut-off device that is warranted by the manufacturer to minimize drippage. Handlers must wear the personal protective equipment required in the PPE section of this labeling for mixers and loaders.

Applicators must use an application nozzle designed to propel the application hose through the sewer using water-jetting capabilities. The nozzle should be designed to allow water to escape under pressure and thereby creating a rocket like effect that both propels the nozzle forward while preparing the roots and pipe for the application herbicide. Once the hose and nozzle have arrived at the beginning of the herbicide application location the applicator will turn off the water pressure and the spring-loaded nozzle will switch to the foaming application.

The applicator must retrieve the hose hydraulically while applying foaming herbicide within the pipe.

A clean water rinse hose must be positioned to continuously rinse off the application hose as it is extracted from the pipe.

The applicator must shut off the foaming herbicide 50 feet before the applicator nozzle reaches the manhole in order to purge the last of the foaming herbicide from the hose prior to it exiting the manhole.

Water soluble packets, when used correctly, qualify as a closed mixing/loading system under the Worker Protection Standard [40 CFR 170.607(d)]. Mixers and loaders handling this product while it is enclosed in intact water soluble packets may elect to wear reduced PPE of long-sleeved shirt, long pants, shoes, socks, a chemical-resistant apron, and chemical-resistant gloves. When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down."

Left Panel – Outer Box Label (cont.)

USE PRECAUTIONS

Consideration must be given to all sewer service lines and building elevations and basements for the possibility of foam coming up out of drains. Consideration must be given to distance between houses and sewers to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps and drains with no traps that would allow foam to easily emerge. Building drains may be plugged to protect against backup and flooding. Follow the directions for measurement and use carefully to avoid using excess foam that may be forced up lateral lines to building drains. Lateral lines may be treated, but do not force excessive foam into service lines which may cause it to be forced up lateral lines into building drains. Building occupants should exit structures if the pungent, rotten egg or sulfur-like odor of metam-sodium is detected. Open windows and ventilate with fans. Flush drains with ample water if the odor comes from them. Use a squeegee, dust pan or wet vacuum and garbage bags for spills or backups and dispose of foam and liquid in an open drain or manhole. After removal of foam and liquid, wash area of spill or backup with water and detergent and flush down drain. If rugs or cloth are contacted, take outside and dry before laundering separately.

Right Panel – Outer Box Label

ENVIRONMENTAL HAZARDS

This pesticide is toxic to mammals, birds, aquatic invertebrates and fish. Keep out of lakes, ponds or streams. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate. Equipment washwaters and wastes resulting from the use of this product must be disposed of on site according to label directions for use or at an approved waste disposal facility. Do not use in potable water systems. Do not use in storm, field or other drains unless effluent is treated in a sanitary sewer system. Keep off lawns and plants as they may be severely injured. Foam should be shoveled off planted areas immediately rather than washing off with water.

This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in ground-water contamination.

In case of chemical emergencies involving a spill, leaks, fire, exposure, or accident, contact CHEMTREC 1-800-424-9300.

USE PRECAUTIONS: High concentrations of these chemical in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants. Large scale applications to sewage collection systems in proximity to a treatment plant should be divided into smaller sectional treatments done at one or two day intervals to minimize effects on the sewage treatment process. Inform appropriate wastewater treatment plant officials prior to use so they may check for any unusual rotten egg or sulfur-like odor of metam-sodium above that of sewage and monitor the performance of filter beds or digesters. If the odor is detected at the sewage treatment plant or the biological breakdown process is adversely affected, root control applications should cease until normal conditions are established. Subsequent treatments should be reduced in size or volume and spread over greater time intervals.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Refer to the Personal Protective Equipment (PPE) section under PRECAUTIONARY STATEMENTS and use all required protective clothing and equipment. The metam-sodium and dichlobenil components must be used only in combination with a foaming agent to control roots in sewer systems according to the directions for use. They must be used only where wastewater treated for root control will be processed through a wastewater treatment facility.

Refer to booklet label on inner package of metam-sodium for detailed directions for use.

Applicators must notify downstream waste water treatment facilities prior to the start of metam-sodium applications so that they may monitor the operations of the wastewater treatment plant.

Applicators must report how much product will be applied to the sewage system to operators of downstream water treatment plants and to inform these operators that high concentrations of these chemicals in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. Refer to booklet label on inner package of metam-sodium for detailed directions for use.

PESTICIDE STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetation matter. Do not store near pet or livestock quarters. Store in a well ventilated area. Keep containers tightly closed when not in use. Do not store below 0°F. The liquid components of this TRI-PAK become cloudy or crystallize at lower temperatures. Warm or store at higher temperatures and mix to dissolve crystals and assure uniformity before use.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL:

ROO-PRU MS-32.7S container: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

ROO-PRU DCB-85W container: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

Outer Box: Dispose of empty box in a sanitary landfill or by incineration or, if allowed by state and local law, by burning. If burned, stay out of smoke.

LIMITATION OF LIABILITY...READ CAREFULLY

See enclosed booklet.

ROO-PRU is a registered trademark of Douglas Products and Packaging Company.

RESTRICTED USE PESTICIDE
Due to Acute Inhalation Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

ROO-PRU[®]
MS-32.7S

A Nonsystemic Fumigant Solution for pruning roots in wastewater collecting systems

Only for use as a combination of metam-sodium, dichlobenil and foaming agent as directed.

ACTIVE INGREDIENT:	% By Weight
Metam-sodium (sodium methyldithiocarbamate)	32.7%
OTHER INGREDIENTS:	<u>67.3%</u>
TOTAL:	100.0%

Contains 3.18 lbs. active ingredient per gallon.

KEEP OUT OF REACH OF CHILDREN
DANGER - PELIGRO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
 (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
IF ON SKIN OR CLOTHING:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
IF SWALLOWED:	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF INHALED:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.
IF IN EYES:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

For emergency information on Roo Pru® Super Tri Pak, call the National Pesticides Information Center 1-800-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.

NOTE TO PHYSICIAN

Probable mucosal damage may contraindicate the use of gastric lavage.

FOR ADDITIONAL PRECAUTIONARY STATEMENTS: See Inside Booklet

In case of significant spills call CHEMTREC 1-800-424-9300

EPA Reg. No. 1015-72

EPA Est. No.

Manufactured for:

Douglas Products and Packaging Company
1550 East Old 210 Highway
Liberty, MO 64068

Net Contents: 2.5 Gallons

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMAN AND DOMESTIC ANIMALS
DANGER**

Corrosive. Causes skin burns. May be fatal if absorbed through skin. Do not get in eyes, on skin or on clothing. Harmful if swallowed or inhaled. Avoid breathing vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Irritating to eyes, nose and throat.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All fumigant handlers who apply or may be exposed to either liquid spray or vapors must wear:

- coveralls over long-sleeve shirt and long pants,
- chemical-resistant gloves made of any waterproof material,
- chemical-resistant footwear plus socks,
- a NIOSH-approved full-face, or helmet/hood style respirator with either
 - an organic-vapor removing cartridge with a prefilter approved for pesticides (MSHA/NIOSH approval number prefix TC-23C), or
 - a respirator with a canister approved for pesticides (MSHA/NIOSH approval number prefix TC-14G).

All mixers and loaders must wear:

- long-sleeved shirt, long pants,
- chemical resistant gloves made of any waterproof material,
- chemical resistant footwear plus socks,
- chemical-resistant apron if transferring or loading the fumigant or cleaning up spills or equipment, and
- be provided, have immediately available, and must wear in an emergency a respirator of the type required in this section.

All support personnel who remain outside the treatment zone and who are not exposed to either liquid spray or vapors must wear:

- long-sleeved shirt, long pants, shoes, and socks, and
- be provided, have immediately available, and must wear in an emergency, such as when they may be exposed to liquid spray or vapors, the handler PPE listed in this section.

See the engineering control section for additional requirements.

USER SAFETY REQUIREMENTS

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

USER SAFETY RECOMMENDATIONS

- Users should wash hands before, eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. As soon as possible, wash thoroughly and change into clean clothing.

ENGINEERING CONTROLS AND APPLICATION RESTRICTIONS

Mixers and loaders must use a system that is capable of removing the pesticide from the shipping container and transferring it into mixing tanks and/or application equipment. At any disconnect point, the system must be equipped with a dry disconnect or dry couple shut-off device that is warranted by the manufacturer to minimize drippage. Handlers must wear the personal protective equipment required in the PPE section of this labeling for mixers and loaders.

Applicators must use an application nozzle designed to propel the application hose through the sewer using water-jetting capabilities. The nozzle should be designed to allow water to escape under pressure and thereby creating a rocket like effect that both propels the nozzle forward while preparing the roots and pipe for the application herbicide. Once the hose and nozzle have arrived at the beginning of the herbicide application location the applicator will turn off the water pressure and the spring-loaded nozzle will switch to the foaming application.

The applicator must retrieve the hose hydraulically while applying foaming herbicide within the pipe.

A clean water rinse hose must be positioned to continuously rinse off the application hose as it is extracted from the pipe.

The applicator must shut off the foaming herbicide 50 feet before the applicator nozzle reaches the manhole in order to purge the last of the foaming herbicide from the hose prior to it exiting the manhole. **USE PRECAUTIONS:** Consideration must be given to all sewer service lines and building elevations and basements for the possibility of foam coming up out of drains. Consideration must be given to distance between houses and sewers to be treated, depth of sewers compared to drains in buildings, line obstructions, broken and empty traps and drains with no traps that would allow foam to easily emerge. Building drains may be plugged to protect against backup and flooding. Follow the directions for measurement and use carefully to avoid using excess foam that may be forced up lateral lines to building drains. Lateral lines may be treated, but do not force excessive foam into service lines which may cause it to be forced up lateral lines into building drains. Building occupants should exit structures if the pungent, rotten egg or sulfur-like odor of metam-sodium is detected. Open windows and ventilate with fans.

Flush drains with ample water if the odor comes from them. Use a squeegee, dust pan or wet vacuum and garbage bags for spills or backups and dispose of foam and liquid in an open drain or manhole. After removal of foam and liquid, wash area of spill or backup with water and detergent and flush down drain. If rugs or cloth are contacted, take outside and dry before laundering separately.

Water soluble packets, when used correctly, qualify as a closed mixing/loading system under the Worker Protection Standard [40 CFR 170.607(d)]. Mixers and loaders handling this product while it is enclosed in intact water soluble packets may elect to wear reduced PPE of long-sleeved shirt, long pants, shoes, socks, a chemical-resistant apron, and chemical-resistant gloves. When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for “applicators and other handlers” and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.”

ENVIRONMENTAL HAZARDS

This pesticide is toxic to mammals, birds, aquatic invertebrates, and fish. Keep out of lakes, ponds, or streams. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate. Equipment washwaters and wastes resulting from the use of this product must be disposed of on site according to label directions for use or at an approved waste disposal facility. Do not use in potable water systems. Do not use in storm, field or other drains unless effluent is treated in a sanitary sewer system. Keep off lawns and plants as they may be severely injured. Foam should be shoveled off planted areas immediately rather than washing off with water.

In case of chemical emergencies involving a spill, leaks, fire, exposure, or accident, contact CHEMTREC 1-800-424-9300.

USE PRECAUTIONS: High concentrations of these chemical in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants. Large scale applications to sewage collection systems in proximity to a treatment plant should be divided into smaller sectional treatments done at one or two day intervals to minimize effects on the sewage treatment process. Inform appropriate wastewater treatment plant officials prior to use so they may check for any unusual rotten egg or sulfur-like odor of metam-sodium above that of sewage and monitor the performance of filter beds or digesters. If the odor is detected at the sewage treatment plant or the biological breakdown process is adversely affected, root control applications should cease until normal conditions are established. Subsequent treatments should be reduced in size or volume and spread over greater time intervals.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flames.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Refer to the Personal Protective Equipment (PPE) section under PRECAUTIONARY STATEMENTS and use all required protective clothing and equipment. The metam-sodium component must be used only in combination with the ROO-PRU DCB 85W dichlobenil component and with the ROO-PRU WFA wetting/foaming agent to control roots in sewer systems according to the directions for use. **They must be used only where wastewater treated for root control will be processed through a wastewater treatment facility.**

Applicators must notify downstream waste water treatment facilities prior to the start of metam-sodium applications so that they may monitor the operations of the wastewater treatment plant.

Applicators must report how much product will be applied to the sewage system to operators of downstream water treatment plants and to inform these operators that high concentrations of these chemicals in wastewater may adversely affect the biological sewage breakdown process in wastewater treatment plants.

GENERAL

1. Determine which collection system lines have known root problems and require treatment with root control chemicals.
2. Best results are obtained if the pipe to be treated is cleaned with a high pressure jet cleaner prior to the chemical treatment. When roots are mechanically cut or severely damaged by the cleaning process allow 60 to 90 days for root regrowth to start prior to chemical treatment.
3. Following treatment allow 60 to 90 days for the roots to die and decompose prior to assessing the effectiveness of the treatment.
4. Establish your treatment sequence. In order not to affect previously treated sections, start with the uppermost manhole section of the line to be treated.
5. Check all safety equipment for serviceability. USE THE EQUIPMENT and follow the procedures as described under the PPE section on this label and as prescribed by OSHA for confined space entry.
6. Equipment Calibration: It is recommended that equipment calibration be checked daily or any time conditions of operation change. Due to variation in equipment and conditions, consult and follow the equipment manufacturer's recommendations on calibration procedures. Contact your chemical supplier for the nonpesticidal formulation to use for calibration purposes.
7. Calculate quantity of ROO-PRU/water mix to prepare.

NOTE: FUTURE REFERENCE IN THIS BOOKLET WILL BE MADE TO CHEMICAL MIX (mixture of the three components of the Tri Pak and water) AND CHEMICAL MIX GALLON [CMG] – (mixture of the three chemical components, i.e., 1 gallon MS 32.7S + 4 ounces DCB-85W + 0.4 pints WFA = slightly more than 1 gallon).

The following table provides the recipe for the ROO-PRU chemical mix for Foam Fill application:

1 gallon	MS 32.7S + 4 oz. DCB-85W + 0.4 pt. WFA	= 1 CMG
2 gallon	MS 32.7S + 8 oz. DCB-85W + 0.8 pt. WFA	= 2 CMG
2 ½ gallon	MS 32.7S + 10 oz. DCB-85W + 1.0 pt. WFA	= 2.5 CMG
1 Tri-Pak		= 2.5 CMG
1 Super Tri-Pak		= 5 CMG

Tests show that the chemical mix is stable for at least 7 days prior to use.

Instructions for Using Water Soluble Packages Directly into Spray Tanks:

Water Soluble Packages (WSPs) are designed to dissolve in water. Agitation may be used, if necessary, to help dissolve the WSP. Failure to follow handling and mixing instructions can increase your exposure to the pesticide products in WSPs. WSPs, when used properly, qualify

as a closed mixing/loading system under the Agricultural Worker Protection Standard [40 CFR 170.607(d)].

Handling Instructions

Follow these steps when handling pesticide products in WSPs.

1. Mix in spray tank only.
2. Handle WSP(s) in a manner that protects package from breakage and/or unintended release of contents. If package is broken, put on PPE required for clean-up and then continue with mixing instructions.
3. Keep the WSP(s) in outer packaging until just before use.
4. Keep the WSP dry prior to adding to the spray tank.
5. Handle with dry gloves and according to the label instructions for PPE.
6. Keep WSP intact. Do not cut or puncture WSP.
7. Reseal the WSP outer packaging to protect any unused WSP(s).

Mixing Instructions

Follow the steps below when mixing this product, including if tank mixed with other pesticide products. If being tank mixed, the mixing directions 1 through 9 below take precedence over the mixing directions of the other tank mix products. WSPs may, in some cases, be mixed with other pesticide products so long as the directions for use of all mixed products do not conflict. Do not tank mix this product with products that prohibit tank mixing or have conflicting mixing directions.

1. If a basket or strainer is present in the tank hatch, remove prior to adding the WSP to the tank.
2. Fill tank with water to approximately one-third to one-half of the desired final volume of spray.
3. Stop adding water and stop any agitation.
4. Place intact/unopened WSP(s) into the tank.
5. Do not spray water from a hose or fill pipe to break or dissolve the WSP(s).
6. Start mechanical and recirculation agitation from the bottom of tank without using any overhead recirculation, if possible. If overhead recirculation cannot be turned off, close the hatch before starting agitation.
7. Dissolving the WSP(s) may take up to 5 minutes or longer, depending on water temperature, water hardness and intensity of agitation.
8. Stop agitation before tank lid is opened.
9. Open the lid to the tank, exercising caution to avoid contact with dusts or spray mix, to verify that the WSPs have fully dissolved and the contents have been thoroughly mixed into the solution.
10. Do not add other allowed products or complete filling the tank until the bags have fully dissolved and pesticide is thoroughly mixed.
11. Once the WSP have fully dissolved and any other products have been added to the tank, resume filling the tank with water to the desired level, close the tank lid, and resume agitation.
12. Use the spray solution when mixing is complete.

13. Maintain agitation of the diluted pesticide mix during transport and application.

14. It is unlawful to use any registered pesticide, including WSPs, in a manner inconsistent with its label.

Chemical Preparation: Prior to diluting chemical with water, mix the three ingredients together by adding the contents of one (1) 10 oz. bottle of ROO-PRU DCB-85W and one (1) pint bottle of ROO-PRU WFA to one (1) 2 ½ gallon container of ROO-PRU MS 32.7S.

Replace 2 ½ gallon cap and invert repeatedly until thoroughly mixed then pour contents into chemical/water mix tank or blend chemical mix and water just prior to the foam equipment. DO NOT store the mixed chemical for more than 7 days. Remix chemical prior to use. DO NOT prepare more chemical/water mix than can be used in one day.

- A. Determine total footage of pipe by pipe diameter and method of treatment, i.e., foam fill or foam spray to be treated in a given day. Use promptly after mixing. DO NOT allow chemical/water mix to stand overnight. DO NOT allow solution to stand (mild agitation is necessary to keep the DCB-85W in suspension). Flush all equipment with water after each days use. Disassemble valves and clean thoroughly.
- B. The two methods of calculating the ROO-PRU mix ratio and amount of chemical mix/water solution to prepare are dependent on pipe diameter and method of application. Pipe diameter 10" or less require filling the entire pipe void with foam (Foam Fill). Pipe diameters of 12" or larger are more economically treated by using a nozzle designed to place foam directly on the root masses and pipe surface (Foam Spray). In addition to pipe size, other factors may dictate the method of application, i.e., wastewater level and velocity of flow, root density, etc,

Foam Fill: Four (4) Inch (+) Pipe (entire pipe void)

Foam characteristics desired: dry, dense, and cohesiveness similar to shaving cream.

Application Procedures for Foam Fill Requirements, Mixing and Calculations

Sewer Pipe Capacities are:

Diameter/Inch	Gal./Foot	Diameter/Inch	Gal./Foot
4	0.7	16	10.5
6	1.5	18	13.5
8	2.5	20	16.3
10	4.0	21	18.0
12	6.0	24	23.5

- 1. Check sewer pipe capacity table above to determine total foam required. Pipe capacity (foam/foot) x (length of section) + (10-25%) = foam volume required.
- 2. After determining foam volume in gallons required to fill the section(s) of sewer line to be treated with foam, use the following table to determine the ROO-PRU/water solution required.

Foam Produced Per Gallon of Solution:

To Water	Add ROO-PRU	Amount of Foam Produced
25.0 Gal.	1.0 CMG	540 gal.
50.0 Gal.	2.0 CMG	1,080 gal.
62.5 Gal.	2.5 CMG	1,350 gal. (1 Tri-Pak)
125.0 Gal.	5.0 CMG	2,700 gal. (1 Super Tri-Pak)
200.0 Gal.	7.5 CMG	4,050 gal. (1 ½ Super Tri Pak)

3. Main Line: Insert chemical discharge hose through the entire section of pipe to be treated. Start foam generating equipment and withdraw discharge hose at a rate calibrated to fill the line to capacity until foam appears at input manhole. Refer to equipment manual for the specific calibrated rate of hose retraction.
4. Building Service Lines: USE EXTREME CAUTION. Always plug building side of cleanout to prevent backup into building. Always treat from cleanout closest to building down to sewer main. Attach the chemical discharge hose to a pneumatic type by-pass pumping plug. Insert and position the plug in the service line cleanout and inflate in the cleanout to prevent foam from overflowing and/or the plug blowing out. CAUTION: CHEMICAL OVERFLOWING OR SPILLED ON GROUND ADJACENT TO THE CLEANOUT MAY CAUSE DAMAGE TO DESIRABLE PLANTS AND LANDSCAPING.

Once the plug has been securely inflated, pump foam into the line until required amount has been discharged into the service line. Refer to the equipment manual for specific calibration rate.

FOAM SPRAY: Twelve (12) Inch and Larger Pipe (directed to roots and pipe surface).

Foam characteristics desired: Wet, dense, noncohesive. Splatters when applied to manhole walls.

1. Reduce the amount of ROO-PRU WFA (wetting/foaming adjuvant) to one half (1/2) when preparing chemical mix, i.e.:

1.0 CMG	=	0.2 pt. WFA
2.0 CMG	=	0.4 pt. WFA
2.5 CMG	=	0.5 pt. WFA

The excess WFA may be kept and used as a calibration agent.

2. See the table below to determine the reference quantity of foam spray needed per foot of pipe, then multiply by the length of pipe to be treated to determine the total amount of finished foam needed.

Pipe Diameter	Foam Gal./Ft.	Pipe Diameter	Foam Gal./Ft.
12"	4	32-36"	12
14"	8	40-42"	14
16"	10	44-48"	16

These reference quantities of foam may be adjusted to account for varying root and flow conditions within the pipe. Foam Gal./Foot x Total = Finished Foam Needed

3. In order to determine the amount of chemical mix solution to prepare from the total amount of foam spray required, divide foam spray required by 20 (20 gallons of foam spray are produced from 1 gallon of chemical mix solution) refer to the following table for solution mixing instructions to obtain the proper chemical mix to water (volume/volume).

To Water Coat	Add ROO-PRU	Total Solution	Foam Spray
14 gal.	1 CMG	15 gal.	300 gal.
28 gal.	2 CMG	30 gal.	600 gal.
35 gal.	2.5 CMG	37.5 gal.	750 gal.
70 gal.	5 CMG	75 gal.	1500 gal.

4. Foam Spray Application: Insert the chemical discharge hose through the entire section of pipe to be treated, install foam spray nozzle and position about 2 inches above the flow line of the pipe. Start foam generating equipment and withdraw the chemical hose

at rate calibrated to foam spray the specified diameter. Refer to equipment manual for specific calibration rate.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetation matter. Do not store near pet or livestock quarters. Store in a well ventilated area. Keep containers tightly closed when not in use. Do not store below 0°F. The liquid components of this TRI-PAK become cloudy or crystallize at lower temperatures. Warm or store at higher temperatures and mix to dissolve crystals and assure uniformity before use.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

LIMITATION OF LIABILITY...READ CAREFULLY

To the extent consistent with applicable law, seller disclaims all liability, tort or otherwise, and all warranties, expressed or implied, including merchantability, seller shall not be liable for any damages, whether they be direct, consequential, special or indirect, which result from the use or handling of this product. Seller's sole liability and buyer's and user's sole remedy shall be limited to the refund of the purchase price.

RESTRICTED USE PESTICIDE
Due to Acute Inhalation Toxicity to Humans

For retail sale to and use only by Certified Applicators or persons under their direct supervision and only for those uses covered by the Certified Applicator's certification.

ROO-PRU® DCB-85W

Only for use as a combination of metam-sodium, dichlobenil and foaming agent as directed.

ACTIVE INGREDIENT:	% By Weight
Dichlobenil (2,6-dichlorobenzonitrile)	85.0%
OTHER INGREDIENTS:	<u>15.0%</u>
TOTAL:	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If on skin or clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

For emergency information on Roo Pru® Super Tri Pak, call the National Pesticides Information Center 1-800-858-7378, 6:30 AM to 4:30 PM Pacific time (PT), seven days a week. During other times, call the poison control center 1-800-222-1222.

See additional precautionary statements on side panels.

EPA Reg. No. 1015-72

EPA Est. No.

Manufactured for:

Douglas Products and Packaging Company
1550 East Old 210 Highway
Liberty, MO 64068

Net Weight: 10 oz.

Left Front Panel – Inner Dichlobenil Label

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION**

Harmful if swallowed or absorbed through skin or inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Avoid breathing dust.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators and all other handlers must wear:

- Long-sleeved shirt and long pants
- Socks and shoes
- Chemical-resistant gloves made of any waterproof material
- In addition to the requirements above, mixers and loaders must also wear a chemical-resistant apron

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Right Front Panel – Inner Dichlobenil Label

ENVIRONMENTAL HAZARDS

Keep out of lakes, ponds or streams. Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate. Equipment washwaters and wastes resulting from the use of this product must be disposed of on site according to label directions for use or at an approved waste disposal facility. Do not use in potable water systems or storm, field or other drains from which untreated water is discharged.

This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in ground-water contamination.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Refer to the Personal Protective Equipment (PPE) section under PRECAUTIONARY STATEMENTS and use all required protective clothing and equipment. The dichlobenil component must be used only in combination with the metam-sodium component and with a foaming agent to control roots in sewer systems according to the directions for use. They must be used only where wastewater from root control is processed through a wastewater treatment facility. Refer to specific mixing and use directions and associated calculations on the inner package labeling of the metam-sodium product. Do not use this product without these specific directions and full precautionary labeling.

When used in inhabited buildings (residences, offices, hospitals, etc.) windows must be open or an exhaust fan must be operating during the application.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

PESTICIDE STORAGE: Do not store near food or feed, seeds, bulbs, tubers, nursery stock or other vegetation matter. Keep containers tightly closed when not in use. Store in dry place.

PESTICIDE DISPOSAL: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

LIMITATION OF LIABILITY...READ CAREFULLY

To the extent consistent with applicable law, seller disclaims all liability, tort or otherwise, and all warranties, expressed or implied, including merchantability, seller shall not be liable for any damages, whether they be direct, consequential, special or indirect, which result from the use or handling of this product. Seller's sole liability and buyer's and user's sole remedy shall be limited to the refund of the purchase price.

[EPA APPROVAL]